

MOTION GRANTED

Kevin H. Sharp

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

UNITED STATES OF AMERICA,
Plaintiff

vs

CHRISTOPHER CARDENAS,
Defendant

Case No. 3:16-00192

Hon. Sharp

MOTION TO EXTEND DEADLINE FOR FILING PRETRIAL MOTIONS

Defendant moves for an extension of his deadline to file pretrial motions. His counsel is making arrangements to travel to Michigan later this week to assist his siblings in caring for his mother who is in hospice for her final days or weeks. The last month has been difficult with the sudden deterioration of her health and making final arrangements.

Defendant has also requested but not received from the government all discovery he feels is due and there are three pending discovery related motions (D.E. 16, 18, and 21) that have yet to be ruled on. This discovery may necessitate pretrial motions to be filed depending on what is ultimately received. Finally, Defendant does contemplate filing a motion to dismiss due to violations of the Interstate Agreement on Detainers' time deadlines and anti-shuttling provisions but because of the family issues mentioned above more time is needed to complete a thorough briefing.

Accordingly, Defendant requests an additional two weeks for filing pretrial motions.

Respectfully submitted,

/s/ Jerry Gonzalez